ROBINSON & COLE LLP

Matthew P. Mazzola, Esquire (N.J. ID # 253252017)

666 Third Avenue, 20th Floor

New York, New York 10017

Telephone: (212) 451-2900 Email: mmazzola@rc.com Attorneys for Defendant UMR

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

	X
MODERN ORTHOPAEDICS OF NEW JERSEY,	: Case No. 2:25-cv-01559-MEF-JRA
	:
Plaintiff,	:
	: APPLICATION FOR AN EXTENSION
v.	: OF TIME TO ANSWER, MOVE OR
	: OTHERWISE REPLY TO THE
UMR,	: COMPLAINT (L. CIV. R. 6.1(b))
	:
Defendant.	:
	V

Defendant, UMR, respectfully requests that the Clerk of this Court issue an Order pursuant to Rule 6.1(b) of the Local Civil and Criminal Rules of the United States District Court for the District of New Jersey ("Local Rules") extending its time to answer, move, or otherwise reply to Plaintiff, Modern Orthopaedics of New Jersey's Complaint for a period of two weeks from March 25, 2025, to and including April 8, 2025, and it is represented that:

- 1. Plaintiff filed its Complaint on February 28, 2025 (ECF No. 1). Plaintiff filed the Summons Returned Executed on March 14, 2025, reflecting service of the Summons and Complaint on Defendant on March 4, 2025 (ECF No 4).
- 2. Defendant's deadline to respond to the Complaint is March 25, 2025. Pursuant to Local Rule 6.1(b), Defendant requests a two-week extension of time to respond to Plaintiff's Complaint from March 25, 2025, to and including April 8, 2025.
 - 3. No previous extension for the Complaint has been requested.

Dated: March 24, 2025

Respectfully submitted,

ROBINSON & COLE LLP

By: /s/ Matthew P. Mazzola

Matthew P. Mazzola
(N.J. ID # 253252017)
666 Third Ave., 20th Floor
New York, NY 10017

Telephone: (212) 451-2900 Email: mmazzola@rc.com

Attorneys for Defendant UMR

ORDER

The above application is GRANTEL	D. Defendant UMR's time to answer, move or otherwise
reply to the Complaint is extended from March 25, 2025, to and including April 8, 2025.	
ORDER DATED:, 20	025
	MELISSA E. RHOADS, Clerk of Court
	D.
	By: Deputy Clerk